

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Expanding the Economic and Innovation
Opportunities of Spectrum Through Incentive
Auctions

Docket No. 12-268

COMMENTS OF McBRIDE SPECTRUM PARTNERS, LLC.

McBride Spectrum Partners, submits these comments in response to the Notice of Proposed Rulemaking ("NPRM") issued in the above-captioned proceeding.¹

Interoperability

Interoperability is an absolute must and the Commission must address it ASAP. Interoperability across all of the 600 MHz spectrum band and 700 MHz spectrum band including the Upper C Block spectrum that Verizon Wireless uses for its so called "open network" in the 700 MHz spectrum band.² Without interoperability in place beforehand the spectrum for sale will be devalued before you get out of the starting gate and will greatly increase the risk of a complete auction failure.

Restrictions on Auction Participation.

The Commission should Limit all carriers to no more than 100 MHz. of spectrum below 1

¹ Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, Notice of Proposed Rulemaking, Docket No. 12-268 (rel. Oct. 2, 2012) ("NPRM").

² See 700 MHz Block A Good Faith Purchaser Alliance, Petition for Rulemaking Regarding the Need for 700 MHz Mobile Equipment to be Capable of Operating on All Paired Commercial 700 MHz Frequency Blocks (filed Sept. 29, 2009). (a) Peter Cramton, 700 MHz Device Flexibility Promotes Competition at 8 (Aug. 9, 2010) ("Cramton Report"), attached to Ex Parte Letter from Rebecca Murphy Thompson, General Counsel for Rural Cellular Association, to Marlene H. Dortch, Secretary, FCC, filed in RM-11592 (Aug. 10, 2010).

GHz band and restrict the participation of particular carriers in these auctions on the basis of their existing spectrum holdings. The commission must not allow the competition in the wireless marketplace to be threaten by a few big carriers who are willing to spend billions in the spectrum auctions with the objective of owning all of the spectrum and ruling the air and locking out the competition by default. Small business must have equal access to spectrum in the 600 MHz band the most valuable asset on the planet today.³

Small Business Bidding Credits

We support the Commission's efforts to promote participation by rural, and new entrants, and the proposal to provide bidding credits to small and very small businesses. A very small business should receive a bidding credit of 50% off its gross bid in the auction in order to level the playing field for very small business carriers for the benefit of all consumers.

Markets

The Markets of 5 MHz X 5 MHz for all of the counties in the U.S .This way a very small business and win a few licenses.

.Respectfully submitted

Vincent D. McBride

³ 47 U.S.C. § 309(j)(3)(B) See, e.g., 47 U.S.C. § 332(a)(3), (c)(1)(C); see also Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Mobile Wireless, including Commercial Mobile Services, WT Docket No. 10-133, Fifteenth Report, 26 FCC Rcd 9664, 9687 ¶ 3 (2011) ("15th Wireless Competition Report").